

**Stormwater Management Program Plan for NPDES MS4  
General Permit ILR40**

**Dunleith Township, IL**

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## Introduction

The U.S. Environmental Protection Agency and Illinois Environmental Protection Agency (Illinois EPA) administer a stormwater permit process under the National Pollutant Discharge Elimination System (NPDES) requirements for Small Municipal Separate Storm Sewer Systems, referred to as MS4 communities. These regulatory requirements involve addressing potential sources of stormwater pollutants within a community.

This report serves to summarize strategies and goals for the Stormwater Management Program for Dunleith Township (Township) to meet requirements of the Illinois EPA's MS4 General NPDES Permit No. ILR40. This plan serves to document Best Management Practices (BMPs) already performed by Dunleith Township as well as identify future goals and BMPs to be implemented to strengthen the Township's Stormwater Management Program. The report is formatted to mirror the six minimum control measure areas identified by NPDES Permit ILR40 and subareas which are required to be addressed as part of the Notice of Intent (NOI) for coverage that is submitted to the Illinois EPA. For each section, key BMPs are identified, along with measurable goals and a schedule for adopting BMPs that are not already implemented. The Illinois EPA requires submittal of an annual report that reports on the progress on these goals.

A representative of the Illinois EPA indicated in December 2021 that the Township is required to meet requirements and obtain coverage under the MS4 program because Fentress Lake, within the limits of the Township, is designated as impaired. Fentress Lake is listed on the Illinois EPA 2020/2022 303(d) list with total suspended solids runoff listed as a cause.

Dunleith Township is in the northwest corner of Jo Daviess County. The City of East Dubuque (City) is within the borders of the Township but is governed independently. The population within the Township at the 2010 census was approximately 3,800, with approximately 1,700 residents within the City and the remaining residents within the jurisdiction of the Township. The Township's primary jurisdiction is over the approximately 12.5 miles of roads within the township boundaries, and some township-owned property. The Township does not have any jurisdiction within the City. Properties within the Township are also subject to the rules and regulations of Jo Daviess County. Much of the regulations and approvals/permitting for construction are administered by the County, including requiring a County review and approval of Township road projects such as culvert replacements or reconstructions.

The Illinois EPA Website (link below) which provides information on the MS4 program includes a copy of the current General NPDES Permit for MS4s which provides a complete set of requirements for coverage under General Permit ILR40. This general permit is periodically renewed by the Illinois EPA, and the renewal process typically includes updates to the standard permit conditions. The current version of ILR40 and guidance from the Illinois EPA should be reviewed regularly by users of this Stormwater Management Program documentation to ensure continued compliance.

Illinois EPA MS4 Permit Website:

<https://www2.illinois.gov/epa/topics/forms/water-permits/storm-water/Pages/ms4.aspx>

It is intended that the BMPs, goals, and strategies of this Stormwater Management Plan be regularly reviewed for possible updates as part of the annual report process or as necessitated by other changes.

## **A. Public Education and Outreach**

General NPDES Permit ILR40 requires Dunleith Township to distribute educational materials or conduct equivalent outreach activities to educate citizens on steps the public can take to reduce pollutants in stormwater runoff including topics such as effective pollution prevention and green infrastructure strategies.

The Township does not currently have a website and due to the size and needs of the community does not have intentions of developing a website in the near future. The City has offered to assist the Township with hosting certain information on the City's website on behalf of the Township. As of June 2022, the City and Township are jointly working through developing content for this website. These discussions have included the idea that the City and Dunleith township can use a joint stormwater webpage or webpages to provide public information on stormwater pollution prevention. Information specific to Dunleith Township MS4, such as this Stormwater Management Program Plan, the NOI, contact information for Township officials for the public to contact with stormwater questions or problems, will also be included on a portion of the website. The BMPs and goals below reflect this joint development of website content.

### **A.1 Distributed Paper Material**

1. BMP: Provide publicly available printed material pertaining to stormwater pollution prevention at the Township Building for pickup by residents who visit. This will be in a handout/brochure format. This material will be placed in the same location as the Township's existing Household Hazardous Waste Facts and General Information brochure.
  - a. Measurable goal: Identify relevant additional informational material available from the EPA and create physical copies to distribute at the Township Building.
  - b. Schedule:
    - i. Year 1: Continue to make available printed material at the Township Building. Review and consider whether any additional printed materials should be added by the end of the third quarter of 2022.
    - ii. Year 2 and beyond: Review publicly available information regularly and update copies of handouts as needed.

### **A.2 Speaking Engagement**

The Township does not have an established speaking engagement program. The Township has in the past worked with the League of Women Voters of Jo Daviess County on speaking events surrounding water quality topics as that group has developed presentations that are given to multiple groups within the county. The Township will continue to work with the organization in the future, but there are not specific identified goals for this item.

### **A.3 Public Service Announcement**

1. BMP: Collaborate with the City to post educational materials about stormwater pollution prevention on the City's website that can also be accessed by Township residents. This website will provide links and references to information related to stormwater pollution-prevention, including information specifically aimed at minimizing discharges of pollutants from private property and activities which discharge into the storm sewer system, as well as "green infrastructure" strategies.

- a. Measurable goal: Develop the new webpage or webpages in conjunction with the City with the information outlined above and track the number of visitors to the page(s). Report this information in the Township's annual report.
  - b. Schedule:
    - i. Year 1: Create and post public information content on the website by the end of the third quarter of 2022.
    - ii. Year 2 and following:
      - At a minimum, review the website page annually in March to determine if any additional public information should be updated or added. Additional reviews and updates may occur as needed at any time.
      - Track and report the number of visitors to stormwater webpages in the annual report.
2. BMP: Also post information for Dunleith Township's Stormwater Management Program and MS4 NPDES documents on the newly created webpage. Documentation to be posted to include the Stormwater Management Plan, NOI documents, and current and past annual reports. This website will be updated as these documents are created, updated or revised.
- a. Measurable Goal: Post MS4 documents and notify residents of public information related to Dunleith Township's Stormwater Management Program which will be posted on the City's website. This will be noted to residents at an annual town meeting in April. Continue to notify residents at least once annually about this information as a reminder.
  - b. Schedule:
    - i. Year 1:
      - Post the initial NPDES documentation and basic MS4 program information by the end of July 2022.
      - Release a notice to Township residents about the webpages by the end of the first quarter of 2023.
    - ii. Year 2 and Following:
      - Notify Township residents at a minimum of once annually about the information available on the website.
      - Post the current NOIs and annual reports each year on the website as they are developed.

#### A.4 Community Event

1. BMP: The Township hosts cleanup days twice per year, in the Spring and Fall. Continue to hold these events and use them as an opportunity to make available to residents who attend the paper handouts and notices about the website information discussed above and answer any questions from residents.
  - a. Measurable goal: Distribute stormwater pollution prevention information at cleanup days annually and note the dates of the events in the annual report.
  - b. Schedule:
    - i. Year 1 and following: Begin making materials on stormwater pollution prevention available at the Fall 2022 cleanup day and continue for subsequent cleanup days in future years.

#### A.5 Classroom Education Material

There are no schools within the jurisdiction of the Township (only within the limits of the City) and so the Township does not have a specific strategy for classroom educational material at this time.

#### A.6 Other Public Education

The Township has not identified any other specific educational strategies at this time.

### **B. Public Participation/Involvement**

Per the General NPDES Permit ILR40 requirements, the Township shall provide a minimum of at least one annual public meeting for the public to provide input on the adequacy of the Township's MS4 Program. This requirement can be met as part of a regular Township Board meeting or can be a separate meeting.

#### B.1 Public Panel

Dunleith Township does not currently host a public panel on stormwater topics.

#### B.2 Educational Volunteer

Dunleith Township does not have a dedicated Educational Volunteer at this time.

#### B.3 Stakeholder Meeting

The Township does not currently hold any specific stakeholder meetings. However, the Township's regular monthly board meetings are open to the public and include a public comment period where residents can comment on items even if they are not on the agenda, which provide an opportunity for public comment at any time. Township staff are also willing to meet with any groups/stakeholders that would like to request a meeting about stormwater related topics.

#### B.4 Public Hearing

1. BMP: Discuss the Township's MS4 program, including progress towards measurable goals, necessary revisions, and summary of annual reporting, at a board meeting at least once per year. Provide a specific opportunity for public comment on the MS4 program at this meeting. The Township holds an annual meeting in April of each year that is anticipated to be when this discussion would occur. Continue to allow public attendance at Board meetings with an opportunity for public comment where residents could choose to raise any stormwater concerns.
2. BMP:
  - a. Measurable goal: Include discussing progress, necessary updates, and annual reporting on the MS4 program with an opportunity for public comment on the agenda of a board meeting at least once annually. Provide proper public notice of this meeting per standard state requirements.
  - b. Schedule:
    - i. Year 1 and following: Include discussion of the Township's MS4 Program with an opportunity for public comment on the agenda for at least one Township Board meeting, typically expected to be at the annual Township meeting held in April.

#### B.5 Volunteer Monitoring

1. BMP: The webpage being developed jointly with the City will include a note on their webpage informing residents that stormwater pollution issues they observe within the Township can be reported to the Township to be formally addressed. This notice will remind residents that prompt reporting is important to preventing or minimizing pollution. Contact information for Township officials will be provided and reports received will be routed to the appropriate official for a response.
  - a. Measurable goal: Post Township contact information on the stormwater website and keep a record of all comments/reports received as well as responses or actions taken and include them in the City's annual report.
  - b. Schedule:
    - i. Year 1: Include the contact information and statement noted above on the web pages being created to host stormwater information by the end of July 2022.
    - ii. Year 2 and following: Monitor and document all stormwater comments directed to the Township.

#### B.6 Program Involvement

The Township hosts a community clean-up day as discussed above under Section A.4. The Township does not directly accept hazardous materials as part of this cleanup day, but there are commercial facilities in Jo Daviess County that accept hazardous material waste for proper disposal. Residents who inquire with the Township about disposal of hazardous materials are referred to the proper location.

#### B.7 Other Public Involvement

1. BMP: Work towards ensuring environmental justice by promoting events and information in ways accessible to all segments of the public.
  - a. Measurable goal: When providing information related to the MS4 program in a physical space, ensure proper public notices for public meetings and events are provided through the same means used to typically distribute Township notices.
  - b. Schedule:
    - i. Year 1 and following: Ongoing distribution of information through accessible means as noted.

### **C. Illicit Discharge Detection and Elimination**

The Township utilizes various methods to detect and address potential illicit discharges into the stormwater system and waterways within the Township jurisdiction. The Township does not have storm sewer within the areas under its jurisdiction, but instead stormwater is primarily handled through ditches and culverts. The Township regularly cleans and inspects culverts within the roadway right of way under their jurisdiction.

#### C.1 Sewer Map Preparation

While Township officials responsible for maintenance of the roads are familiar with the locations of catch basins and culverts which are under Township jurisdiction, the Township has not previously had a specific map of this stormwater infrastructure prepared. As part of developing this program plan, a map will be created to assist with inventory and tracking of inspections of this infrastructure.

1. BMP: Create a map of crossroad culverts and inlets for stormwater infrastructure under Township jurisdiction. Mapping should show the location of all outfalls as well as the names of all waters that receive discharges from those outfalls.
  - a. Measurable goal: Produce an updated map of the storm sewer system.
  - b. Schedule:
    - i. Year 1: Create a map of stormwater infrastructure (crossroad culverts and inlets) within the Township's jurisdiction by the end of the third quarter 2022.
  - c. Measurable goal: At a minimum of once annually, regularly review and update the Township's stormwater map if changes are found to be required. Consider updating the mapping as soon as possible after known changes to the stormwater infrastructure, such as the addition of new Township roads.
  - d. Schedule:
    - i. Year 2 and Forward: Review the Township's maps annually in the first quarter of the year (January-March) and revise if necessary to include the updated maps in the Township's annual report.

### C.2 Regulatory Control Program

The Township is within Jo Daviess County. The County Code of Ordinances, Specifically Title 5, has specific restrictions and makes it unlawful for any person to store or dispose of hazardous materials within the county unless such disposal follows all state and federal rules. These County Ordinances also provide restrictions and rules for the installation and maintenance of facilities for storage of materials that could potentially result in illicit discharges, such as hazardous materials, fuel tanks, etc. Regulation and enforcement of these requirements remains with Jo Daviess County. Therefore, the Township does not currently have independent regulations regarding these items at this time as all lands within Township jurisdiction are subject to these county regulations.

### C.3 Detection/Elimination Prioritization Plan

The Township conducts periodic inspections of stormwater infrastructure and outfalls to ensure they are functioning properly and to note any potential issues with illicit discharges.

1. BMP: Conduct periodic dry weather inspections of storm sewer outfalls to identify any signs of illicit discharges or illegal dumping. Priority should be given to major outfalls and those with the greatest potential for non-stormwater discharges, and these should be inspected on an annual basis.
  - a. Measurable goal: Document the systematic approach the Township follows for routine inspections of stormwater infrastructure within the Township's jurisdiction. Develop a checklist for these regular inspections that includes inspection for possible illicit discharges. Maintain records of inspections.
  - b. Schedule:
    - i. Year 1:
      - Conduct annual inspection of the high priority stormwater outfalls to review for any illicit discharges and determine any corrective measures which may be needed by November 2022.
      - Document the City's current practices as a plan for regular inspection, maintenance, and cleaning of stormwater infrastructure. Complete this plan by May 2023.
    - ii. Year 2 and following:

- Continue to implement the County's maintenance and cleaning plan for stormwater infrastructure.
- At a minimum, conduct annual inspection of the high priority stormwater outfalls to review for any illicit discharges and determine any corrective measures which may be needed. Inspect additional stormwater infrastructure as regularly as possible.

#### C.4 Illicit Discharge Tracing Procedures

1. BMP: When illicit discharges or contamination are discovered, Township officials will trace the source upstream and downstream through the drainage network to identify the source and contain the spread of the contaminant.
  - a. Measurable goal: Document activities related to illicit discharge events, tracing activities, and resulting actions taken.
  - b. Schedule:
    - i. Year 1 and following: Track and trace illicit discharges identified and record the corrective actions taken on an ongoing basis.

#### C.5 Illicit Source Removal Procedures

1. BMP: If Illicit discharges are identified that are hazardous in nature, the Township contacts the fire department and the county Hazardous Materials Response Team to assist with the removal of contaminants in accordance with rules and regulations and well as BMPs for hazardous substances.
  - a. Measurable goal: When illicit discharge sources are identified in the storm sewer network, contact fire department and county officials to assist with deploying a response team to outfall locations to contain and remove contamination. Take appropriate action to eliminate the source. Record these activities as appropriate.
  - b. Schedule:
    - i. Year 1 and following: Take effective action to remove contaminants from the storm water system as they are identified on an ongoing basis.

#### C.6 Program Evaluation and Assessment

1. BMP: The Township will review the Stormwater Management Program at least once annually, as further described under section B.4.
  - a. Measurable goal: Township officials should review the Stormwater Management Plan and associated documentation, including specific goals for elimination of illicit discharges, and discuss progress, necessary updates, and annual reporting on the MS4 program at a Township Board meeting at least once annually.
  - b. Schedule:
    - i. Year 1 and following: Discuss the MS4 program at an annual Township Board meeting in April.
2. BMP: Should revisions to the Stormwater Management Program be needed, the Township will determine required changes following the annual plan review prior to the submission of their annual report.

- a. Measurable goal: Make updates to the MS4 program as warranted throughout the year and resulting from the annual review and include these updates along with the Township's annual report.
- b. Schedule:
  - i. Year 1 and following: Update the Township's Stormwater Management Program and include such updates in the submission of the Township's annual report in May.

#### C.7 Visual Dry Weather Screening

1. The Township will make annual dry weather inspections of outfalls, as further described in section C.3. All high priority outfalls will be reviewed annually, and as much of the remaining system as is feasible will be reviewed based on the Township's plan for inspections.
  - a. Measurable goal: Document dry weather inspections of outfalls as described above in C.3.
  - b. Schedule:
    - i. Year 1 and following: Visually inspect outfalls and document the results of the inspections by November of each year.

#### C.8 Pollutant Field Testing

The Township does not currently have a pollutant field testing program.

#### C.9 Public Notification

Refer to Sections A and B of this report for a summary of public notification and involvement strategies for the overall program that the Township uses to inform residents of potential impacts of illicit discharges and methods for reporting illicit discharges and other stormwater concerns.

#### C.10 Other Illicit Discharge Controls

No other specific illicit discharge controls have been identified at this time.

### **D. Construction Site Runoff Control**

Dunleith Township does not issue permits for construction for private properties within the Township. Rather, permits for construction, including associated construction site stormwater runoff requirements and all associated inspections, are handled through the Jo Daviess County Planning and Development office. The County provides a list to the Township of permits issued on a monthly basis.

As a result, projects over 1 acre of disturbance rarely occur within property with direct Township jurisdiction, which primarily includes the road right-of-way. If a large road project or building remodel or addition were to be undertaken by the Township that would result in the disturbance of more than 1 acre of land, appropriate procedures following Illinois EPA requirements for obtaining coverage under General NPDES Permit No. ILR10 would be followed. These projects are not common for the Township as new subdivisions are administered by the County as previously noted and most maintenance activities are minor in terms of land disturbance area. If the Township were to undertake a large construction project, it would also require county involvement/approvals, and the Township likely obtain outside assistance with the development of plans for the project which would incorporate appropriate construction site stormwater control BMPs.

Small maintenance projects undertaken by the town usually only disturb a very small amount of ground and are short in duration. Standard BMPs, such as the use of silt fence and covering with seeding and mulch shortly after completion of grading, are considered where important to containing sediment.

As the Township does not typically have projects under its jurisdiction that over 1 acre that are subject to construction site runoff control regulations, no specific goals or commitments have been identified for this control measure.

## **E. Post-Construction Runoff Control**

Dunleith Township does not issue permits for construction for private properties within the Township. Rather, permits for construction, including any requirements for post-construction stormwater runoff controls, and all associated inspections, are handled through the Jo Daviess County Planning and Development office. The County provides a list to the Township of permits issued on a monthly basis.

As a result, projects over 1 acre of disturbance rarely occur within property with direct Township jurisdiction, which primarily includes the road right-of-way. If a large road project or building remodel or addition were to be undertaken by the Township that would result in the disturbance of more than 1 acre of land, post-construction BMPs would be reviewed and considered at that time. These projects are not common for the Township as new subdivisions are administered by the County as previously noted and most maintenance activities are minor in terms of land disturbance area. If the Township were to undertake a large construction project, it would also require county involvement/approvals, and the Township likely obtain outside assistance with the development of plans for the project which would incorporate appropriate construction site stormwater control BMPs.

As the Township does not typically have projects under its jurisdiction that over 1 acre that are subject to post-construction runoff control regulations, no specific goals or commitments have been identified for this control measure.

## **F. Pollution Prevention/Good Housekeeping**

Township operations are relatively limited in scope and primarily involve maintenance activities related to the approximately 12.5 miles of roads under Township jurisdiction, including plowing snow, occasional culvert replacements, and keeping the roads in good repair.

### **F.1 Employee Training Program**

1. BMP: Town Road Commissioner will discuss appropriate stormwater BMPs with Township maintenance personnel at least once annually as a training program to emphasize the importance of these BMPs.
2. Measurable goal: Track attendance at this meeting and include this information in the City's annual report.
3. Schedule:
  - a. Years 1-5:
    - i. Hold an annual training meeting each year.

### **F.2 Inspection and Maintenance Program**

1. BMP: Township vehicles and maintenance equipment are regularly assessed for maintenance needs and inspected for fluid leaks. If needed, vehicle maintenance is done

by a third-party mechanic at an auto shop to help ensure appropriate protections against accidental spills or issues.

- a. Measurable goal: Inspect and document condition and needed repairs for all Township vehicles at least once annually.
- b. Schedule:
  - i. Year 1 and following: Document condition of all Township vehicles and maintenance equipment at least once annually.

#### F.3 Municipal Operations Storm Water Control

1. BMP: Salt purchased for winter road maintenance is stored in a salt shed.
  - a. Measurable goal: Continue to responsibly store salt in an enclosure.
  - b. Schedule:
    - i. Year 1 and following: Continue to store road salt in a covered enclosure at all times.

#### F.4 Municipal Operations Waste Disposal

1. BMP: Vehicle maintenance and washing is done indoors, with waste collected to a holding tank that is emptied approximately once per month. The holding tank has an alarm that triggers when the tank is full to prevent accidental overflows.
2. BMP: Floor-dri/oil-dri material is maintained at maintenance sites in case of fuel spills.
3. BMP: In the event of fuel spills, the fire department is called to assist with the situation and ensure proper cleanup of any contamination.
4. BMP: Oil-dri material is maintained at maintenance sites in case of vehicle spills
  - a. Measurable goal: Develop a record-keeping system for regular inspections and maintenance that is done to ensure these BMPs are maintained.
  - b. Schedule:
    - i. Year 1: By the end of third quarter 2022, develop a checklist and log of inspections for maintenance areas that helps ensure facility BMPs are in good working order for the coming year.
    - ii. Year 1 and following: continue recording regular maintenance and inspection of maintenance area BMPs.

#### F.5 Flood Management/Assess Guidelines

Dunleith Township does not currently have a specific flood management program.

#### F.6 Other Municipal Operations Controls

No other specific goals for municipal operations have been identified at this time.

## **Appendix**

### **Stormwater Management Website Content**

Dunleith-specific information to be posted on the joint City of East Dubuque/Dunleith Township stormwater management webpage or webpages to be developed in 2022 and maintained going forward will include:

- A. The current Notice of Intent for MS4 Permit Coverage
- B. A link to the current Illinois EPA Website with full MS4 NPDES General Permit information:  
<https://www2.illinois.gov/epa/topics/forms/water-permits/storm-water/Pages/ms4.aspx>
- C. This Stormwater Management Program Document
- D. Annual Reports submitted to the Illinois EPA as they are developed.
- E. Contact information for a Township official to allow for residents to ask questions about the Stormwater Management Program or to call to report a problem or concerns.
- F. Other items as identified

## **Calendar of Activities to be Completed Annually**

### Annual Tasks with No Specific Timeframe

1. Distribute stormwater pollution prevention information at cleanup days annually and note the dates of the events in the annual report.
2. Monitor and document all stormwater comments directed to the Township via a log system.
3. Discuss relevant Stormwater Management/Pollution Prevention topics with Township maintenance personnel at least once annually to provide annual training and emphasize the importance of stormwater BMPs (See Section F).
4. Document condition of all Township vehicles and maintenance equipment at least once annually.
5. Continue to implement the Township's maintenance and cleaning plan for stormwater structures/culverts. At a minimum, conduct annual inspection of the high priority stormwater outfalls to review for any illicit discharges and determine any corrective measures which may be needed. Inspect additional stormwater infrastructure as regularly as possible.
6. Keep records of any of the following as received to include in the annual report. Record the information received and any resolutions/actions taken:
  - i. Track and trace illicit discharges identified and record the corrective actions taken on an ongoing basis.
  - ii. Annual inspection/maintenance of relevant components of municipal operation BMPs such as waste disposal items, visual monitoring of fuel tank facilities, spill response materials, etc. (See Section F)
7. Continue to host clean up days twice a year and record in the annual report documentation.

### January

1. Review the Township's stormwater infrastructure maps annually in the first quarter of the year (January-March) and revise if necessary to include the updated maps in the Township's annual report.

### March

1. Review the information posted on the joint City/Township webpages to determine if any public information content should be updated or added if not already done within the last year. If updates are needed, coordinate with the City.
2. Prepare Annual Report. Report Content should summarize items from March of the previous year to March of the current year. Consider if any revisions to the Stormwater Management Program Plan are warranted at the same time.

### April

1. Include discussion of the Township's MS4 Program with an opportunity for public comment on the agenda for at least one Township Board meeting, typically expected to be at the annual Township meeting held in April. Remind Township residents about the Stormwater Management information posted on the joint City/Township website.

### May

1. Submit Annual Report to Illinois EPA before June 1<sup>st</sup>.
2. Post the updated Annual Report (and updated NOIs, Stormwater Management Plan, or other documents if relevant) to the Stormwater Management webpage.

### October

1. Verify that all annual inspections, such as visual dry-weather inspection of high priority outfalls (See C.7) or inspections of Township operations and maintenance items, have occurred. If any remain, schedule for completion while the weather still allows and before the end of November.

## **Calendar or Items to be Completed in First 5 Years of Plan:**

This list is intended to summarize items noted within the plan above that are annual, ongoing tasks. Please refer to the additional task list for items that are to be performed on an annual basis.

### Year 1 (Through June 1, 2023)

1. Website tasks:
  - a. Work with the City to add information for the Township on the City's website, including posting basic MS4 NPDES documentation for Dunleith (copy of this report, NOI, etc.) in July 2022.
  - b. Include the contact information for a Township official for reporting violations or issues on web pages being created (Refer to B.5) in July 2022.
  - c. Coordinate with the City to create and post additional public information content on the Stormwater Management webpage(s) by the end of the third quarter of 2022.
2. Review and consider whether any additional printed educational materials available at the Township Building for pickup by residents by the end of the third quarter of 2022.
3. Begin making materials on stormwater pollution prevention available at the Fall 2022 cleanup day and continue for subsequent cleanup days in future years.
4. Create a map of stormwater infrastructure (crossroad culverts and inlets) within the Township's jurisdiction by the end of the third quarter 2022.
5. Stormwater Infrastructure Inspection Items:
  - a. Conduct annual inspection of the high priority stormwater outfalls to review for any illicit discharges and determine any corrective measures which may be needed by November 2022.
  - b. Document the City's current practices as a plan for regular inspection, maintenance, and cleaning of stormwater infrastructure. Complete this plan by May 2023.
6. Document condition of all Township vehicles and maintenance equipment at least once annually.
7. Continue to store road salt in a covered enclosure at all times.
8. Municipal Operations Items: By the end of third quarter 2022, develop a checklist and log of inspections for maintenance areas that helps ensure facility BMPs are in good working order for the coming year.

### Year 2 and following:

2. Review the Township's stormwater infrastructure maps annually in the first quarter of the year (January-March) and revise if necessary to include the updated maps in the Township's annual report.
3. Stormwater Infrastructure Inspection Items:
  - a. Continue to implement the County's maintenance and cleaning plan for stormwater infrastructure.
  - b. At a minimum, conduct annual inspection of the high priority stormwater outfalls to review for any illicit discharges and determine any corrective measures which may be needed. Inspect additional stormwater infrastructure as regularly as possible. Visually inspect outfalls and document the results of the inspections by November of each year.
4. Illicit Discharge Detection and Elimination items:
  - a. Track and trace illicit discharges identified and record the corrective actions taken on an ongoing basis.
  - b. Year 1 and following: Take effective action to remove contaminants from the storm water system as they are identified on an ongoing basis.

5. Update the Township's Stormwater Management Program and include such updates in the submission of the Township's annual report in May.
6. Discuss relevant Stormwater Management/Pollution Prevention topics with Township maintenance personnel at least once annually to provide annual training and emphasize the importance of stormwater BMPs (See Section F).
7. Operation and Maintenance items: continue recording regular maintenance and inspection of maintenance area BMPs.